

The proposed rules on HF BPL (over power line), do not adequately provide testing that reflects the interference potential to mobile licensed HF radio users, and HF receivers. There has been no testing of skip interference by BPL, which will be a problem under the propagation changes. There is inadequate provision for a licensed radio service to be able to identify BPL interference source by some form of ID on the BPL signal that is easily decoded. A Morse code ID such as on aircraft non directional beacons is suggested. This is particularly important when the RFI from BPL is propagated by skip, and is not local to the licensed user receiving interference or the Short Wave listeners. The types of BPL being tested now do not adequately notch out the licensed services to which they will interfere. BPL should be moved therefore to higher frequencies where notching would not be as problematical. BPL requires repeaters every 2000 feet in most applications. Rules are needed to require leakage from such repeaters to not interfere with mobile services that are licensed and driving under such power lines where repeaters are located. Rules are needed to provide for notice to licensed services when BPL is proposed to be installed within 1000 feet or less of a licensed station in the FCC database. Rules for interference should include sanctions for failure to immediately shut off the BPL when notified by any licensed service pending testing to correct the interference. Thank you for considering these comments,
Stuart Rohre
Licensed since 1957 as amateur Radio station K5KVH and others.